From: Dan Itse [itsenh@comcast.net]
Sent: Sunday, July 31, 2005 1:51 PM
To: RPS, DOER (ENE)
Subject: Post Meeting Comments

After listening to the technology discussion I have the following comments.

There seems to be a lot of focus on what constitutes advanced. If you define advances as what it newest or most complicated, fluid beds are definitely more advanced than stokers. However, if you define advanced as most efficient or elegant in simplicity, then stokers are more advanced. The truth is that stokers, bubbling fluid beds and circulating fluid beds are all established technologies, the youngest of which is 20 yrs old. The stoker design that That is standard today is substantially different than that of 20 yrs ago.

The reason that fluid beds entered the combustion market was because of their inherent low emission features due to low combustion temperature and the ability to add limestone to the bed. Furthermore, they were well suited to low volatile fuels such as petroleum coke and anthracite culm. These advantages are not relevant when considering wood. Wood is low in nitrogen and sulfur, and burns readily.

There are reasons why one would choose to a fluid bed in designing a power plant, most notably fuel switching. Such is the case with Schiller station which is permitted to burn coal as well as wood, and meet the same environmental constraints. If wood should ever become to expensive as a fuel, they can readily blend in or switch to coal or other opportunity fuels such as RDF or tire derived fuel. However, this is not the goal of the RPS.

I firmly believe that the RPS should be based on emissions, and the individual applicants can decided if they want a facility that is going to be more efficient or have the capacity for opportunity fuels.

That said, I fully endorse the concept of a discounted REC (but not time limited) for existing plants which would support the more modest capital investment, operating costs, and ensure their continued economic viability.

Hon. Daniel C. Itse
Christofferson Engineering
Tel./Fax (603) 642-9403